



STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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CERTIFIED MAIL

November 18, 2013

Steve Pankhurst
President
BP Pipelines North America
150 W. Warrenton Road
Naperville, IL 60563

Dear Mr. Pankhurst:

RE: 2013 Hazardous Liquid Standard Inspection – BP Pipelines North America- BP Cherry Point Refinery

Staff from the Washington Utilities and Transportation Commission (staff) conducted a standard inspection from October 28 - 30, 2013 of BP Pipelines North America (BP), BP Cherry Point Refinery. The inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates one area of concern, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

Your response needed

Please review the attached report and respond in writing by December 19, 2013. The response should include the detailed procedure or steps needed to evaluate these facilities for atmospheric corrosion.

Staff would like to thank BP's personnel for their professionalism and cooperation during this inspection.

If you have any questions or if we may be of any assistance, please contact Dave Cullom at (360) 664-1141. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

David D. Lykken
Pipeline Safety Director

Enclosure

cc: David Barnes, DOT Compliance, BP Pipelines North America



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2013 Hazardous Liquid Pipeline Safety Inspection
BP Pipelines North America – BP Cherry Point Refinery

The following area of concern of Title 49 CFR Part 195 was noted as a result of the 2013 inspection of the BP Pipelines North America – BP Cherry Point Refinery. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

AREAS OF CONCERN OR FIELD OBSERVATIONS

1. **49 CFR §195.583 What must I do to monitor atmospheric corrosion control?**
 - (b) *During inspections you must give particular attention to pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water.*

Finding(s):

There was one item of concern for the non-removable pipe supports used throughout both systems. These make it very difficult, if not impossible, to check for atmospheric corrosion between the supports and the line pipe.